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Office for Information
Technology Policy

ALA American Library Association

May 2, 1997

EX PARTE OR LATE FILED

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW Room 222
Washington, DC 20554

Re: Ex Parte Presentation

CC Docket No: 96-45, Federal-State Joint Board on Universal Service

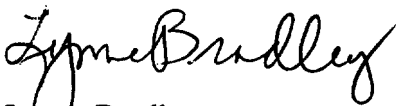
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MAY 2 1997
Federal Communications Commission
Office of Secretary

Dear Mr. Caton:

On May 1st, the American Library Association sent the attached letter to Irene Flannery of the FCC staff. This letter comes in response to questions asked by the FCC staff regarding what the appropriate measure of need would be for libraries.

If you have any questions regarding this filing, please contact either myself or Andrew Magpantay at 202/628 8410.

Sincerely,



Lynne Bradley
Deputy Executive Director
American Library Association Washington Office

Enclosure

CC:

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Office for Information Technology Policy

ALA American Library Association

May 1, 1997

Irene Flannery
Federal Communications Commission
2100 M. St., N.W.
8th Floor
Washington, DC 20554

Re: CC Docket No.: 96-45, Federal-State Joint Board on Universal Service

Dear Ms Flannery:

The American Library Association (ALA) has been working since the inception of CC 96-45 to find a fair, easily administered method for determining discount levels for libraries participating in the Universal Service program. ALA has argued that libraries should have the option of using U.S. Census poverty data in determining the level of library universal service discounts.¹ U.S. Census data more accurately reflects the demographics of a library's service area since it counts both single adults and families without children and is certainly more accurate for communities that have libraries but no schools.²

In ALA's January 10, 1997 *ex parte* ALA showed how, using U.S. Census poverty data, libraries could approximate the level of poverty within their service area for determining an appropriate level of universal service discount. In that filing ALA noted that U.S. Census poverty data was also used as part of the outreach services portion of the Library and Services

¹See, for example, ALA's 1/10/97 Reply Comments on Joint Board Recommendation in CC 96-45; ALA's *ex parte* filings of 3/17/97, 3/28/97, and 4/4/97.

²In many communities, the income levels of families with children attending school might not be representative of the needs of the overall community. Libraries serve both adults and children. Communities where a sizable percentage of the population are retirees or adults without children are examples of areas where the school lunch data would not capture the demographic character of the community. Second, as we specified in our *ex parte* filing of March 28, 1997, some communities which have libraries do not have schools. In New Hampshire, for example, we gave three examples of townships with libraries which send their children to other towns for school. For instance, Dummer, NH, sends its children to Milan Village for grades 1-6 and Berlin for grades 7-12. School lunch data for Milan Village and Berlin would not accurately reflect the community in Dummer.

Technology Act.³ In the January 10, 1997 ex parte, the percentage of poverty residents within a one-mile radius of 500 randomly sampled libraries was calculated to show how a discount matrix for libraries using U.S. Census poverty data could be constructed. As we stated in that filing, "[t]his 1-mile radius serves as an **approximation** for a library outlet's service area."⁴ (Emphasis added.) This 1-mile radius was chosen because historically, libraries have used a one-mile measure to determine the general characteristics of their patrons. Furthermore, Palmer's 1981 literature survey of the effect of distance on public library cites a 1977 study by Elrick and Lavidge that suggests that over one-quarter to one-third of a library's patrons live within seven blocks of the library and approximately half of all users of a library facility live within one mile of that facility.⁵

Koontz has noted in her paper "Geographic Information Systems and Libraries: Patrons, Maps and Spatial Information," that no matter what method is used for measuring a library's service area or market, "It is agreed that all approaches, at best are rough estimates, and that some communities' markets are easier to define than others."⁶ Nonetheless, ALA appreciates the Commission's desire to have the most accurate data available for determining universal service discounts. Palmer's 1981 literature survey of the effect of distance on public library use suggests that depending on the characteristics of the area surrounding the library anywhere from 57.4% to over 90% of a library's patrons live within a 2 mile radius of the library.⁷

The generalized surveys listed in Tables I and II have an average of 57.4 percent of all users living within 2 miles. For the dispersed systems listed in Table III, 76.7 percent of all patrons live within 2 mile, while the urban systems cited in Tables II and IV have over 90 percent of all users coming from within the 2-mile zone.⁸

If the Commission wishes to use a larger sample of a library's service area population in determining the appropriate discount levels, then a 2 mile radius would seem to be an appropriate measure. A 2 mile radius will sample a more significant portion of a library's service population,

³ ALA Reply Comments on Joint Board Recommendation in CC 96-45, January 10, 1997 at 4.

⁴ ALA Reply Comments on Joint Board Recommendation in CC 96-45, 1/10/97.

⁵ Palmer, E. Susan. The Effect of Distance on Public Library Use: A Literature Survey. Library Research, Winter 1981, citing Elrick and Lavidge, Inc. "Public Library Usage in Illinois," Illinois State University, 1977. p.326

⁶ Christie Koontz, *Using Geographic Information Systems for Estimating and Profiling Geographic Library Market Areas*, in GEOGRAPHIC INFORMATION SYSTEMS AND LIBRARIES: PATRONS, MAPS AND SPATIAL INFORMATION. PROCEEDINGS OF THE 1995 CLINIC ON LIBRARY APPLICATIONS OF DATA PROCESSING (Linda C. Smith & Myke Gluck eds., 1995) page 182.

⁷ Palmer. p.326.

⁸ *Ibid.* p.326,

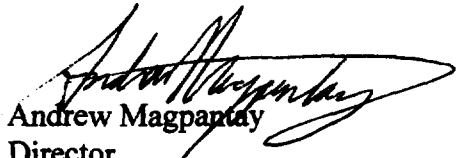
a sample that ranges from more than half to as much as 90% of a library's user population.

As was noted above, no methodology will be entirely perfect. However, given the size of the sample provided by a 2-mile radius; the Commission's desire for a uniform, consistent, standard methodology that can be applied nationally in developing a library discount matrix; and the need to have a method that more accurately represents all of a library's patrons including single adults and families without children such as retirees, ALA believes that a 2-mile radius would be an appropriate measure for use in developing a library discount matrix.

As was stated in ALA's prior ex parte of April 4, 1997, ALA has already engaged the services of Florida State University's Florida Resources and Environmental Analysis Center to produce a table of every public library facility in the United States based on U.S. Census Bureau and National Center for Education Statistics files and can produce such a table to the requirements stated in this ex parte.

If you have any questions about this filing, please contact me at 202/628 8421.

Sincerely,



Andrew Magpantay
Director
Office for Information Technology Policy
American Library Association

Enclosure

CC: William Caton
Acting Secretary, FCC